

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

Edgar FLORES-Jimenez

YOB: 1984/Mexican National

Juan Pablo ROMERO-Gutierrez

YOB: 1978/Mexican National

United States District Court
Southern District of Texas
FILED

AUG 22 2018

CRIMINAL COMPLAINT

CASE NUMBER:

M-18-1726-M

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 21, 2018 in Starr county, in the Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

Knowingly and Intentionally possess with the Intent to Distribute approximately 235 kilograms of Marijuana, a Schedule I Controlled Substance.

Knowingly and Intentionally conspire to possess with the Intent to Distribute approximately ^{235 OVA}~~104~~ kilograms of Marijuana, a Schedule I Controlled Substance.

John

in violation of Title 21 United States Code, Section(s) 846, 841 (a) (1)

I further state that I am a(n) DEA Special Agent and that this complaint is based on the following facts: See Attachment "A".

Continued on the attached sheet and made a part of hereof: ☒ Yes ☐ No

[Signature]
Signature of Complainant
Anthony K. Dominguez, Special Agent (DEA)

[Signature]
Sworn to before me and subscribed in my presence,

August 22, 2018

Date

At

McAllen, Texas

City and State

J. Scott Hacker, U.S. Magistrate Judge

Name & Title of Judicial Officer

[Signature]
Signature of Judicial Officer

ATTACHMENT "A"

On Tuesday, August 21, 2018, at approximately 6:00 AM, United States Border Patrol (USBP) Agents received information of possible narcotics activity in Garciasville, Texas. USBP Supervisory Agent Lisandro Lopez, along with several other agents responded to the area. In doing so, agents were assisted by USBP aircraft in the area. A short time later, agents several subjects were spotted by the aircraft in the area along the Rio Grande River. As the agents made their way to the area where the subjects were, an individual (later identified as Edgar FLORES-Jimenez), came out with his hands up. Another male fled the area and was not located. A search of the area led to the discovery of several large bundles later identified as marijuana. Eight large bundles totaling 235 kilograms of marijuana were seized by the agents. Four other subjects were apprehended by USBP agents away from the area, all with no legal status to be in the United States.

Once at the USBP station FLORES-Jimenez was interviewed by S/A Anthony Dominguez and USBP Victor Soliz. After being advised of his Miranda warnings in Spanish, FLORES-Jimenez stated that he would waive his rights and answer the Agents' questions. When asked to explain how he had come to receive the marijuana, FLORES-Jimenez stated that he had agreed to assist in the marijuana smuggling venture for economic reasons. He advised that he along with several other individuals had agreed to do this and were to receive three-hundred dollars as payment for their assistance. Juan Pablo ROMERO-Gutierrez was also detained by USBP and once at the station was advised of his Miranda warnings in Spanish by TFO Cosme Muñiz and TFO Ricky Garza. ROMERO-Gutierrez waived his rights and advised agents that had been contracted to assist in the smuggling of undocumented individuals from Mexico to the United States. Once at the Rio Grande River bank, ROMERO-Gutierrez was told that he would be participating in "scouting" the area for law enforcement presence to facilitate marijuana being smuggled into the United States instead. The other three subjects claimed no knowledge of the marijuana smuggling and processed by USBP for illegal entry.

S/A Anthony Dominguez contacted McAllen United States Attorney's Office and federal prosecution was accepted.